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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States of America, et al.,

Defendants.

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**MATTHEW DOLLAN'S NOTICE OF
MOTION AND MOTION TO
WITHDRAW AS COUNSEL FOR AMICI
CURIAE CHRISTOPHER SHAYS,
CHRISTINE TODD WHITMAN, PETER
KEISLER, CARTER PHILLIPS, JOHN
BELLINGER III, STANLEY TWARDY,
AND RICHARD BERNSTEIN;
PROPOSED ORDER GRANTING
MOTION TO WITHDRAW**

Case No. 4:19-CV-00872-HSG

SIERRA CLUB and SOUTHERN BORDER
COMMUNITIES COALITION,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, et al.,

Defendants.

Case No. 4:19-CV-00892-HSG

NOTICE OF MOTION

PLEASE TAKE NOTICE that Matthew Dollan, of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, NY 10019, shall and hereby does respectfully seek leave of this Court, pursuant to LOCAL R. 11-5(a) and in compliance with CAL. R. PROF. CONDUCT 3-700, to withdraw as counsel for *amici curiae* Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein.

MOTION TO WITHDRAW AS COUNSEL FOR AMICI CURIAE

Pursuant to LOCAL R. 11-5, Matthew Dollan ("Movant") hereby notifies the parties and the Court of his intent to withdraw as counsel *pro hac vice* for *amici curiae* Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein. Movant offers the following grounds for this notice and motion:

1. This Court granted Movant leave to appear *pro hac vice* in this action pursuant to its May 2, 2019, Order.
2. Movant has represented *amici curiae* as part of his employment at Willkie Farr Gallagher LLP. As of May 9, 2019, Movant will no longer be employed as an attorney at Willkie Farr Gallagher LLP.
3. Willkie Farr Gallagher LLP attorneys Richard Mancino and Shaimaa Hussein, and attorney Richard Bernstein, also represent *amici curiae* and will continue to do so.
4. Movant's withdrawal will not cause any prejudice or delay in this case. All parties have counsel

1 actively representing them, and none will require any additional time to review or acclimate to the
2 absence of Movant as counsel *pro hac vice*.

3
4 5. Given the insubstantial nature of this Motion, as well as the substantial burden to all parties in
5 travelling and attending a hearing on this Motion, Movant respectfully requests that the Court waive
6 oral argument.

7 THEREFORE, Movant Matthew Dollan respectfully requests that this Court waive oral
8 argument on this Motion, grant him leave to withdraw as counsel *pro hac vice* in the above-captioned
9 matter, and enter an order stating that Movant has so withdrawn.

10
11 Dated: May 8, 2019

Respectfully submitted,

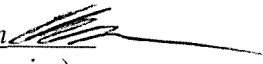
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23 *Counsel for Amici Curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips,*
24 *John Bellinger III, Stanley Twardy, and Richard Bernstein*

/s/ Matthew Dollan 

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2019, I caused the foregoing document to be filed via the U.S. District Court for the Northern District of California's CM/ECF system, which I understand caused service on all registered parties.

/s/ Matthew Dollan

Matthew Dollan